

THOMAS CONNELLY, ESQUIRE
Thomas P. Connelly, Jr.
NJ Atty. No. 012562005
63 North Broad Street
Woodbury, NJ 08096
856.521.3771 (office)
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tpc@attorneytpc.com

WITHDRAWING ATTORNEY FOR DEBTOR,
EUGENE WILLIAM MOORE

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

EUGENE WILLIAM MOORE,

Debtor.

Chapter 13

Case No. 16-24642-ABA

Hearing Date: 02.21.2017

Oral Argument: Not Requested

NOTICE OF MOTION

TO: Eugene William Moore
6 Whitman Avenue
Stratford, NJ 08084

Isabel Balboa
535 Route 38, Suite 580
Cherry Hill, NJ 08002
Chapter 13 Trustee

US Trustee
One Newark Center, Suite 2100
Newark, New Jersey 07102

Denise Carlon, Esquire
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108

*Attorney for U.S. Bank National Association As Trustee Successor
in Interest to Bank of America, National Association, as
Trustee, Successor by Merger to Lasalle Bank National
Association as Trustee for Structured Asset Investment Loan
Trust Mortgage Pass-Through Certificates, series 2004-8.*

R.A. Lebron, Esquire
Fein, Such, Kahn & Shepard, P.C.
7 Century Drive - Suite 201
Parsippany, New Jersey 07054
*Attorney for Secured Creditor Select Portfolio Servicing, Inc.,
as servicer for U.S. Bank National Association, as trustee for
the structured asset investment loan trust mortgage pass-through
certificates, series 2004-8.*

Andrew M. Lubin, Esquire
Milstead & Associates
1 East Stow Road
Marlton, NJ 08053
Attorney for Select Portfolio Servicing, Inc. as servicer for
U.S. Bank National Assn. as trustee for the structured asset
investment loan trust mortgage pass through certificates, series
04-00008.

PLEASE TAKE NOTICE that Thomas P. Connelly, Jr., the attorney
for debtor, Eugene W. Moore, shall move before the Honorable Andrew
B. Altenburg, Jr., United States Bankruptcy Court, 401 Market Street,
Camden, New Jersey on February 21, 2017 at 10:00 a.m. or as soon
thereafter as counsel can be heard for an order:

a. relieving Thomas P. Connelly, Jr. as counsel for debtor.

TAKE FURTHER NOTICE that there are no complicated legal or
factual issues that exist which would benefit from the submission of
briefs.

TAKE FURTHER NOTICE that movant shall rely upon the attached
certification of Thomas P. Connelly, Jr. A proposed form of order and
certification of service are also attached.

Respectfully submitted,



THOMAS P. CONNELLY, JR.

Dated: January 29, 2017

THOMAS CONNELLY, ESQUIRE
Thomas P. Connelly, Jr.
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63 North Broad Street
Woodbury, NJ 08096
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WITHDRAWING ATTORNEY FOR DEBTOR,
EUGENE WILLIAM MOORE

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

EUGENE WILLIAM MOORE,

Debtor.

Chapter 13

Case No. 16-24642-ABA

Hearing Date: 02.21.2017

Oral Argument: Not Requested

CERTIFICATION OF THOMAS P. CONNELLY, JR.

I, THOMAS P. CONNELLY, JR., an attorney at law of the State of New Jersey and the withdrawing attorney for the debtor, Eugene W. Moore, of full age, certify as follows:

1. I am fully-familiar with the facts relative to the herein motion.

2. I am a disabled veteran of the United States Navy, having received a vp shunt due to hydrocephalus secondary to a brain injury while on active duty in South Africa.

3. This past Columbus Day weekend, the shunt malfunctioned and I was admitted on October 11, 2016 for emergency brain surgery at the Hospital of the University of Pennsylvania.

4. I underwent two surgeries and was discharged October 26,

2016.

5. Unfortunately, my convalescence has not gone entirely as hoped. I have made return visits to the ER and was kept for observation on November 13-14.

6. I have since experienced and am presently experiencing additional complications from the surgery.

7. In light of the foregoing, I have decided to close down my solo practice, as I am concerned about my ability to attend to my clients' matters with the competence, see NJ Rule of Professional Conduct 1.1, and diligence, see NJ Rule of Professional Conduct 1.3, required of me given my medical condition.

I certify that the above statements made by me are true. I understand that if any of the aforesaid are willfully false, I am subject to punishment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tom Connelly', with a stylized flourish at the end.

THOMAS P. CONNELLY, JR.

Dated: January 29, 2017

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with
D.N.J. LBR 9004-2(c)

THOMAS CONNELLY, ESQUIRE
Thomas P. Connelly, Jr.
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Woodbury, NJ 08096
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tpc@attorneytpc.com

In re:

EUGENE WILLIAM MOORE,

Debtor.

Case No. 16-24642-ABA

Chapter: 13

Hearing Date 02.21.2017

Judge: Andrew B. Altenburg, Jr.

ORDER

The relief set forth on the following page is ORDERED.

This matter, having been presented to the Court by Thomas P. Connelly, Jr., for good cause it is ORDERED:

1. Thomas P. Connelly, Jr. is relieved as counsel for the debtor.

Dated: _____

Honorable Andrew B. Altenburg, Jr.
Judge of the U.S. Bankruptcy Court,
District of New Jersey

THOMAS CONNELLY, ESQUIRE
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WITHDRAWING ATTORNEY FOR DEBTOR,
EUGENE WILLIAM MOORE

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

EUGENE WILLIAM MOORE,

Debtor.

Chapter 13

Case No. 16-24642-ABA

Hearing Date: 02.21.2017

Oral Argument: Not Requested

CERTIFICATION OF SERVICE

1. I, Thomas P. Connelly, Jr., an attorney at law of the State of New Jersey and withdrawing attorney for the debtor in the above-captioned matter, hereby certify that on January 29, 2017, I caused the foregoing notice of motion to be relieved as counsel, certification of Thomas P. Connelly, Jr., proposed form of order, and this certification to be filed via electronic case filing and served upon all counsel of record via the Court's electronic filing rules as follows:

Isabel Balboa
535 Route 38, Suite 580
Cherry Hill, NJ 08002
Chapter 13 Trustee

US Trustee
One Newark Center, Suite 2100
Newark, New Jersey 07102

Denise Carlon, Esquire
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
Attorney for U.S. Bank National Association As Trustee Successor
in Interest to Bank of America, National Association, as
Trustee, Successor by Merger to Lasalle Bank National
Association as Trustee for Structured Asset Investment Loan
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Milstead & Associates
1 East Stow Road
Marlton, NJ 08053
Attorney for Select Portfolio Servicing, Inc. as servicer for
U.S. Bank National Assn. as trustee for the structured asset
investment loan trust mortgage pass through certificates, series
04-00008.

2. I further certify that also on January 29, 2017, I caused
to be served upon the debtor, Eugene William Moore, the aforesaid
papers by First Class U.S. Mail as follows:

Eugene William Moore
6 Whitman Avenue
Stratford, NJ 08084

3. I certify that the foregoing statements made by me are
true. I am aware that if any of the foregoing statements made by me
are willfully false, I am subject to punishment.

Respectfully submitted,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end.

THOMAS P. CONNELLY, JR.

Dated: January 29, 2017